

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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RICHARD V. PETIX,

Plaintiff,

v.

25-CV-6205-MAV

UNITED STATES OF AMERICA,

Defendant.

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**DECLARATION OF SPECIAL AGENT KEARA JAMIESON**

Pursuant to 28 U.S.C. § 1746, I, Keara Jamieson, declare under penalty of perjury that the following is true and correct.

1. I am a Special Agent with Department of Homeland Security- Homeland Security Investigations (“HSI”) and have been so employed since 2008. I am currently serving as a supervisory special agent in the HSI Buffalo Division.

2. Although I was not the assigned case agent, I have reviewed the records related to an HSI undercover operation involving Richard Petix (“Petix”), as detailed below, and in the attached exhibits.<sup>1</sup> I am familiar with the internal agency policy and procedure, as well as how official records are maintained by HSI, the system by which those records are maintained, and the financial policies of HSI regarding digital currency. Based on my review of the records, I can attest to the information, below.

3. On December 3, 2015, Petix transferred BTC to an undercover agent (“UCA”) during the above-referenced undercover operation. This resulted in a transfer of 36.9998643

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<sup>1</sup> Given the sensitive nature, the attached exhibits include redactions of the personal identifying information of any undercover agent (UCA) and financial account information.

BTC into the HSI Buffalo Overt Armory Bitcoin (“BTC”) wallet on December 5, 2025. **See Exhibits A-1, A-8.**

4. On December 7, 2015, HSI liquidated the 36.9997643 BTC pursuant to policy.<sup>2</sup> In order to liquidate, HSI transferred the 36.9998643 BTC from the HSI Buffalo Overt Armory BTC wallet to an HSI Buffalo Coinbase account. Following the transfer, the balance of the HSI Buffalo Overt Armory BTC wallet was 0.00000000 BTC and the balance of the HSI Buffalo Coinbase account was 36.9997643 BTC (original amount minus a .0001 BTC transaction fee). **See Exhibits A-2 and A-3.** Thereafter, HSI sold the 36.9997643 BTC in its HSI Buffalo Coinbase account, leaving a 0.00000000 BTC balance in the account. **See Exhibit A-6.** Per the BTC rate value that day, HSI received \$14,342.75 as the cash equivalent of 36.9997643 BTC in its HSI Buffalo Coinbase account. **See Exhibit A-4.** Thereafter, HSI initiated a USD cash deposit of \$14,342.75 into the HSI Buffalo Overt M&T Bank account. **See Exhibits A-4, A-5, and A-6.**

5. On December 8, 2015, Coinbase transferred \$14,342.75 to the HSI Buffalo Overt M&T Bank account. **See Exhibit A-7.**

6. Based on my knowledge and experience, as well as a review of HSI’s confidential internal agency policies regarding the digital currencies, HSI liquidates digital currencies as soon as practicable after an undercover operation occurs. HSI Buffalo does not stockpile, or hold, any type of digital currency due to the volatility in digital currency markets.

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<sup>2</sup> Liquidation of the Coinbase account involves a) the sale of the cryptocurrency holdings, and b) a cash out of the balance.

7. When digital currency is purchased or sold, HSI takes screen captures of Coinbase accounts and digital wallets to document that digital currency was moved in an appropriate manner and liquidated completely. See Exhibits A-1 to A-7.

8. Since HSI Buffalo liquidates the digital currency as soon as practicable and takes screen captures of the accounts and digital wallets, and because digital currencies are not physical evidence, no traditional chain-of-custody records are kept.

9. However, HSI does maintain limited financial records relating to the liquidation. In addition to the screen captures mentioned above, an HSI internal form is completed to document the BTC conversion rate and associated transaction fees during the time of liquidation to account for fluctuations in the conversion rate that can result in a gain or loss. See Exhibit A-8.

10. As the attached exhibits demonstrate, the digital currency at issue was liquidated per HSI policy/procedure.

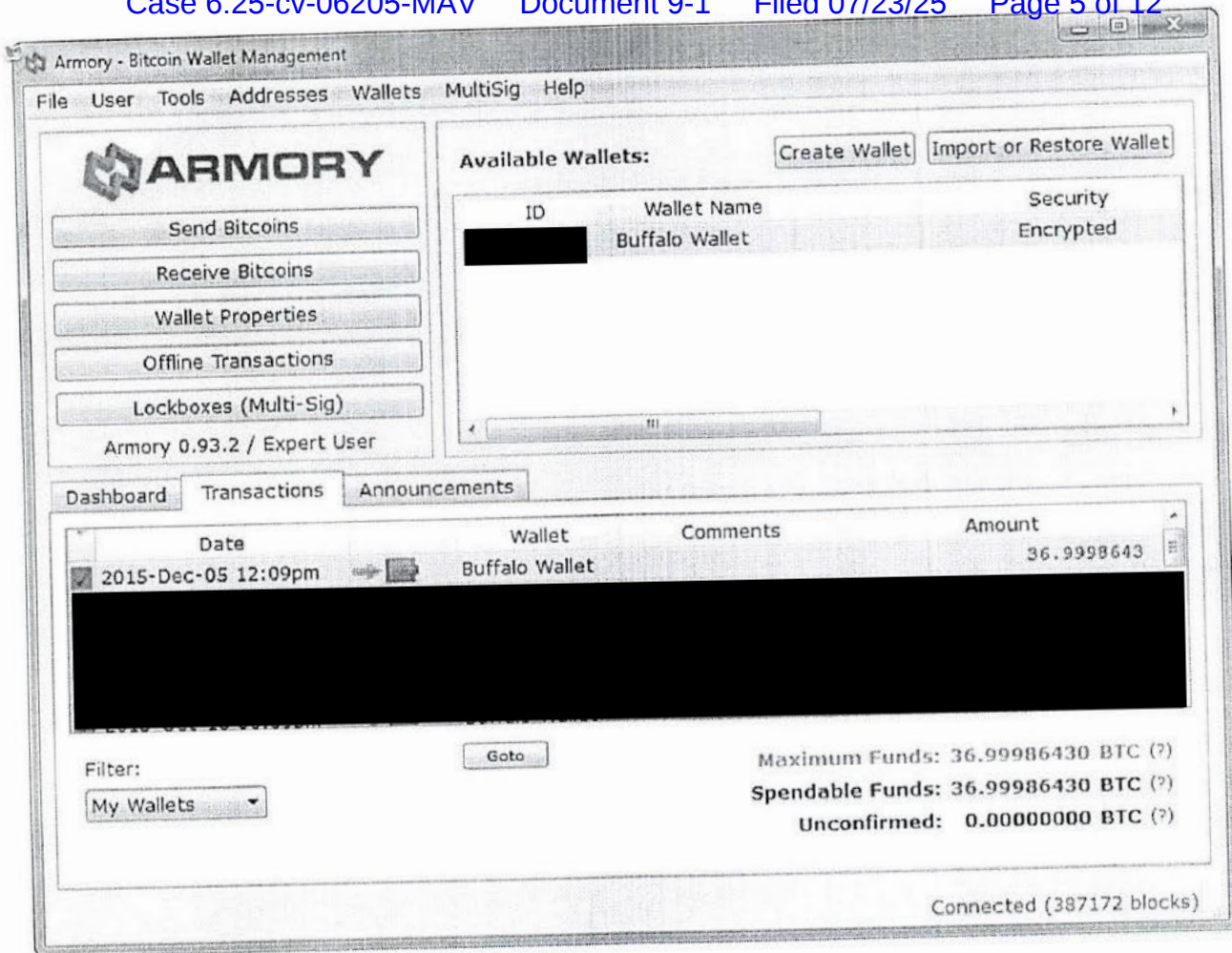
Dated: July 22, 2025



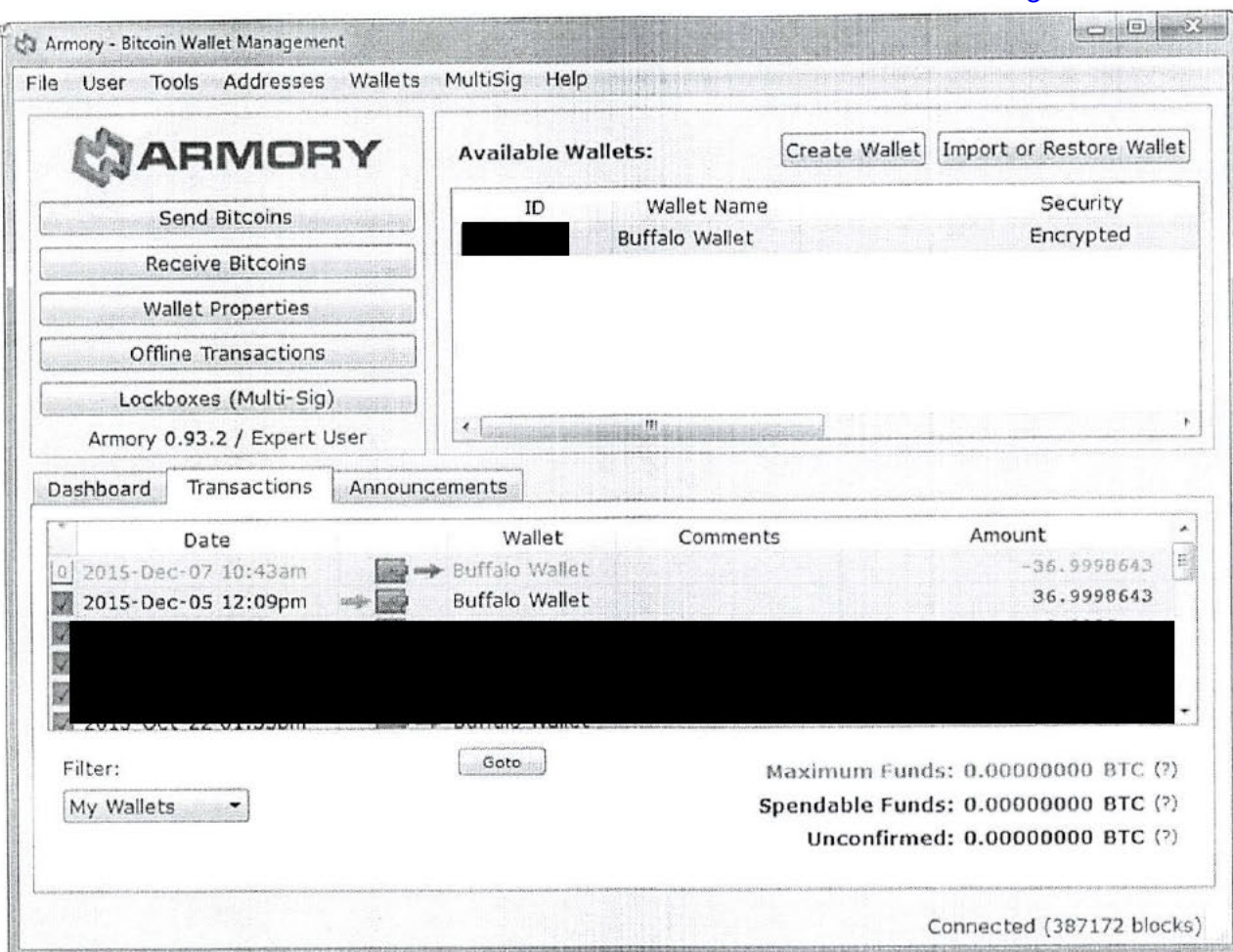
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KEARA JAMIESON  
Supervisory Special Agent  
Homeland Security Investigations  
Buffalo, New York

## Exhibit A

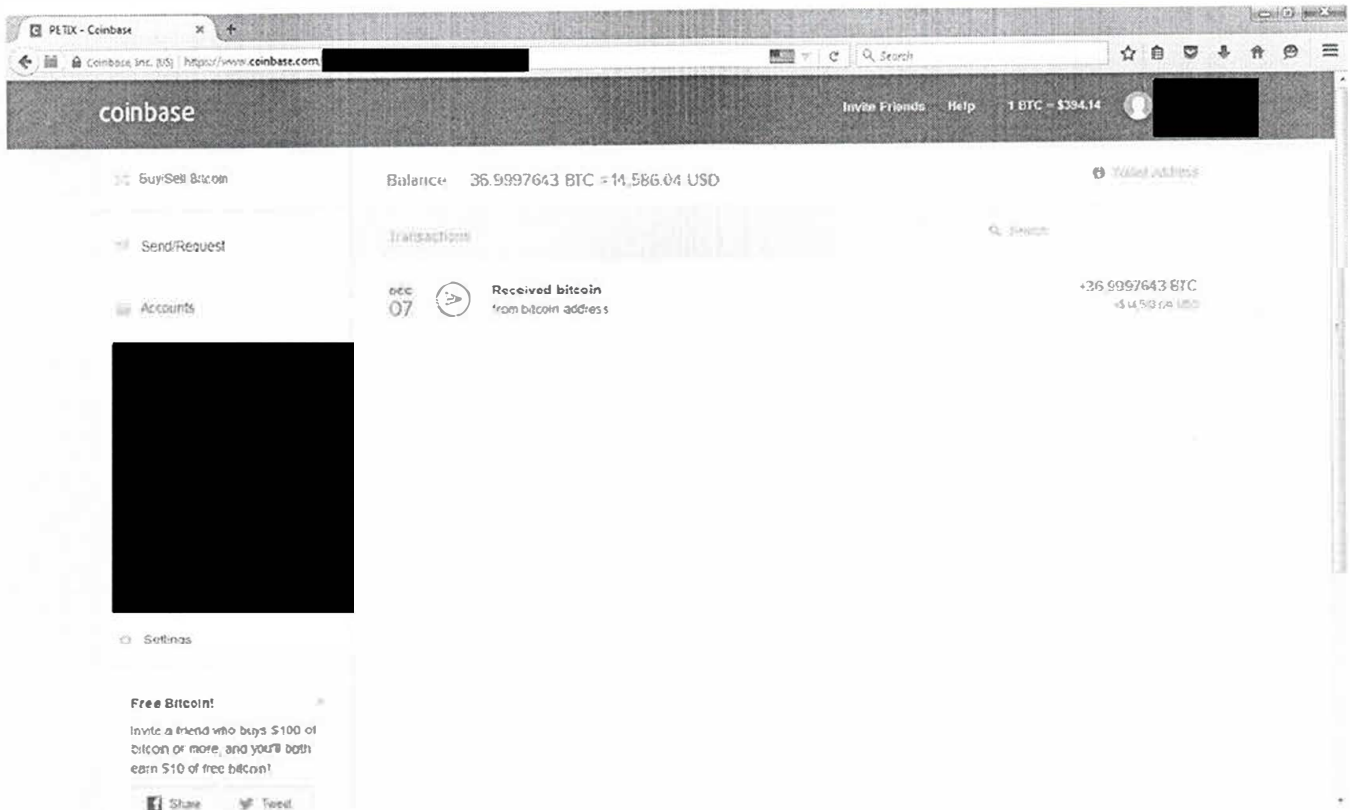


#2 12/7/15 - Overt armory wallet prior to sale transaction. BTC balance 36.99986430 BTC.

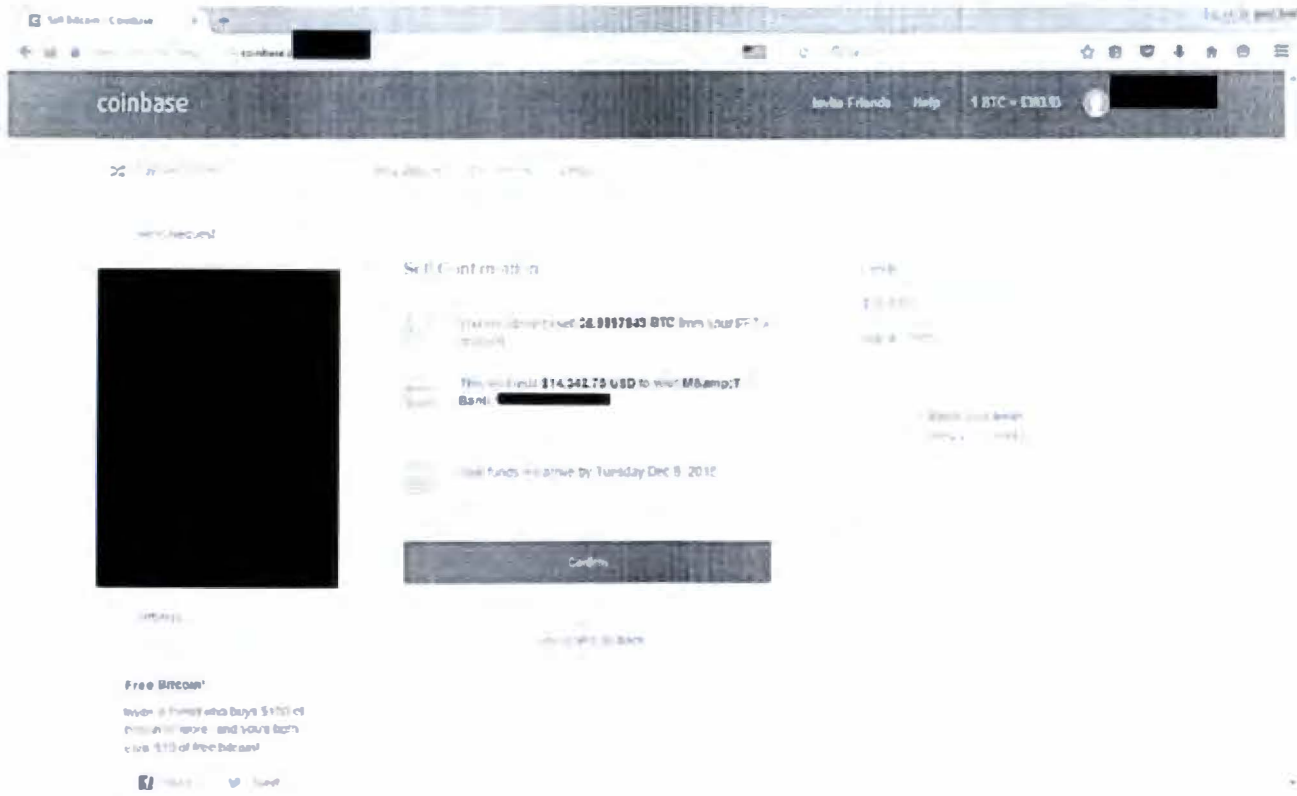


#5 12/7/15 - over armory account  
 showing the transfer of  
 36.9998643 BTC.  
 BTC balance 0.0000 BTC.





(#7) 12/2/15 - Coinbase.com wallet confirmation of receipt of 36.9997643 BTC..

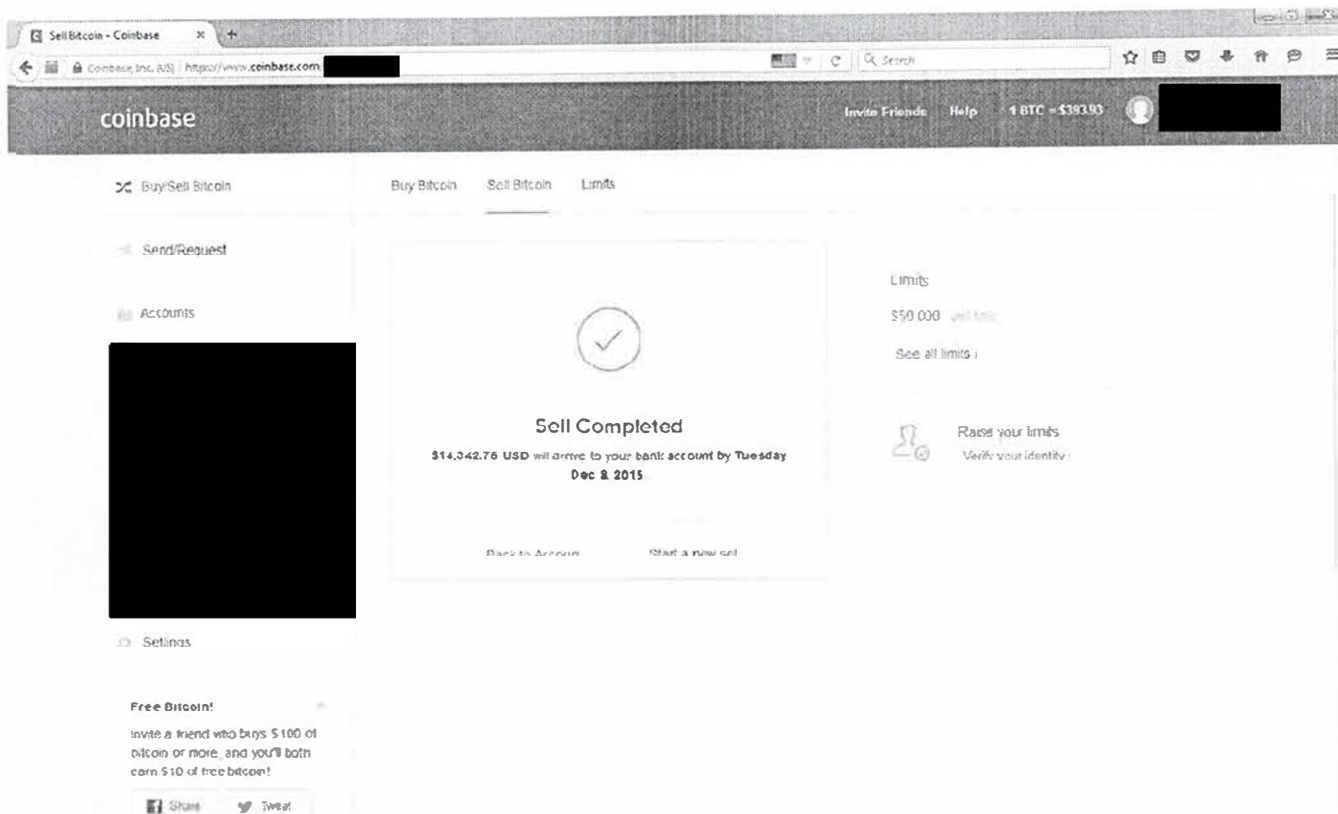


(#9) 12/7/15 - Coinbase.com sell confirmation.

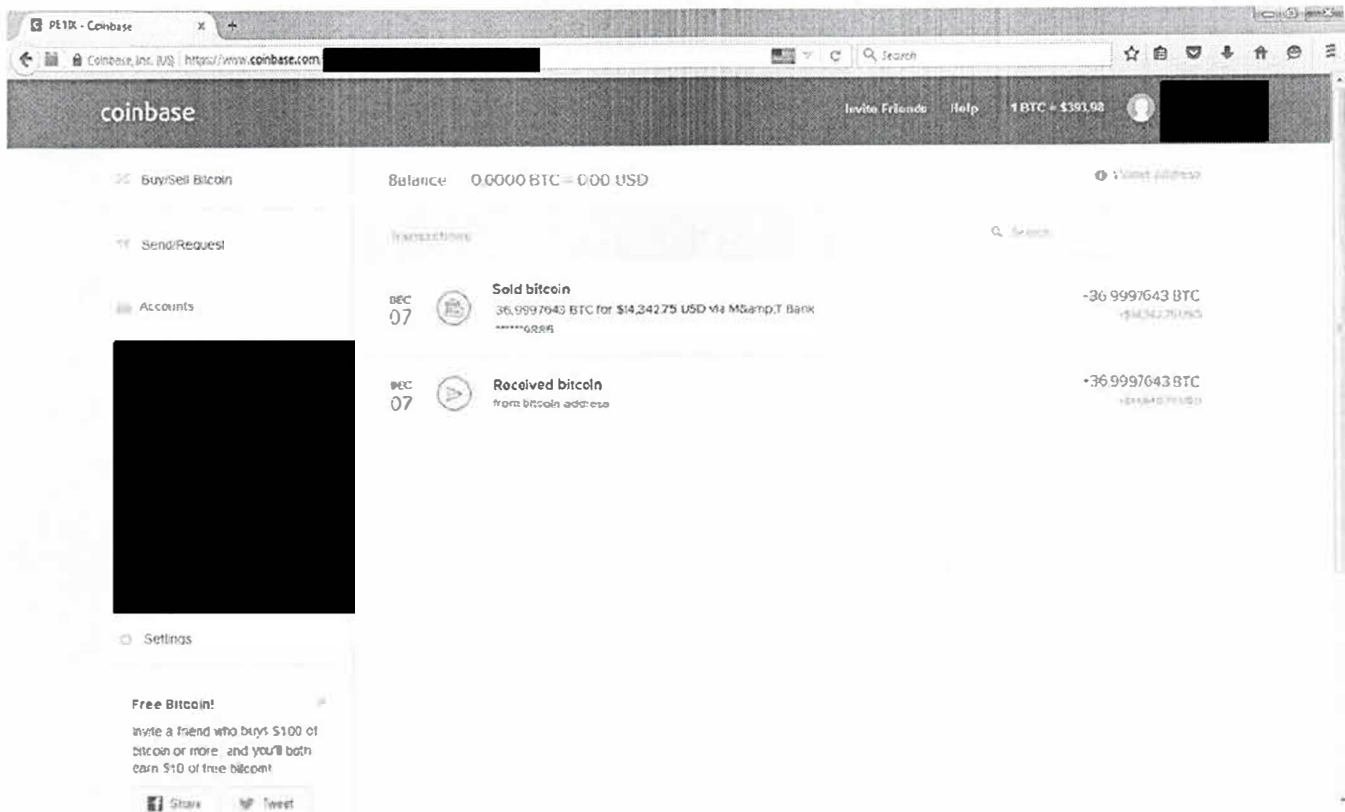
\$14,342.75 to be deposited  
into overr M+T account (9885).

BTC rate = \$391.55





#10 12/7/15 - Coinbase.com sell completed  
Deposit to be made 12/9/15.



(#11) 3/7/15 - Coinbase.com balance of 0.0000 BTC after sale transaction complete.



Bitcoin Transaction Form

Transaction Number: BTC-010 Sale

Type: Purchase / (Sale)

Date of Transaction: 12/7/15

Case Number: BW02UR16BU0003

Case Title: Petix et al.

Target Name: Richard Petix

Case Agent: [REDACTED]

Total USD Amount: \$14,487.35

Total BTC Amount: 36.99976430

Target Fee: N/A

Transaction Fee: \$144.60 / .0001 BTC - \$0.04

BTC Unit Cost: \$391.55

(Gain)/Loss (if sold): \$1,299.16

BTC Transferred to Overt Coinbase Wallet: 36.99976430 BTC

Current Balance of Overt Armory Wallet: 0.000 BTC

APPROVAL:

[REDACTED]

Name

[REDACTED]

Signature

[REDACTED]

Title

12/16/2015

Date